

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
: INDICTMENT
- v. - :
: 22 Cr. 256
TAKESHI EBISAWA, :
SOMPHOP SINGHASIRI, :
BOBBY SOOKSANTA CHULLANANDANA, :
a/k/a "Sooksanta Chullanandana," :
a/k/a "Suksan Jullanan," and :
SOMPRAK RUKRASARANEE, :
Defendants. :
: .
- - - - - X

COUNT ONE
(Narcotics Importation Conspiracy)

The Grand Jury charges:

1. From at least in or about June 2019 to in or about April 2022, in the Southern District of New York, Thailand, Indonesia, Japan, Burma, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, TAKESHI EBISAWA and SOMPHOP SINGHASIRI, the defendants, who were first arrested in the Southern District of New York, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that TAKESHI EBISAWA and SOMPHOP SINGHASIRI, the defendants, and others known and unknown, would and did import into the United States and into the customs territory of the United States from a place

outside thereof controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and an object of the conspiracy that TAKESHI EBISAWA and SOMPHOP SINGHASIRI, the defendants, and others known and unknown, would and did manufacture, distribute, and possess with intent to distribute controlled substances, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substances that TAKESHI EBISAWA and SOMPHOP SINGHASIRI, the defendants, conspired to (a) import into the United States and into the customs territory of the United States from a place outside thereof, and (b) manufacture, distribute, and possess with intent to distribute, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, were (i) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 960(b)(1)(H), and (ii) one kilogram and more of mixtures and substances containing a detectable amount

of heroin, in violation of Title 21, United States Code, Section 960(b)(1)(A).

(Title 21, United States Code, Section 963; and Title 18, United States Code, Section 3238.)

COUNT TWO

Conspiracy to Possess Firearms, Including Machineguns and Destructive Devices)

The Grand Jury further charges:

5. From at least in or about February 2020 to in or about April 2022, in the Southern District of New York, Thailand, Burma, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, SOMPHOP SINGHASIRI, the defendant, who was first arrested in the Southern District of New York, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 924(c).

6. It was a part and an object of the conspiracy that SOMPHOP SINGHASIRI, the defendant, and others known and unknown, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics importation conspiracy charged in Count One of this Indictment, would and did knowingly use and carry firearms, and, in furtherance of such drug trafficking crime, knowingly possess firearms, including machineguns that were capable of automatically shooting more than one shot, without manual reloading, by a single

function of the trigger, as well as destructive devices, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 924(c)(1)(B)(ii).

(Title 18, United States Code, Sections 924(o) and 3238.)

COUNT THREE
**(Conspiracy to Acquire, Transfer, and Possess
Anti-Aircraft Missiles)**

The Grand Jury further charges:

7. From at least in or about June 2019 to in or about April 2022, in the Southern District of New York, Thailand, Indonesia, Japan, Burma, Denmark, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, TAKESHI EBISAWA, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE, the defendants, who were first arrested in the Southern District of New York, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 2332g.

8. It was a part and an object of the conspiracy that TAKESHI EBISAWA, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE, the defendants, and others known and unknown, would and did knowingly acquire, transfer directly and indirectly, receive, possess, import, and export (i) an explosive and incendiary rocket and missile that is guided by a system designed to enable the

rocket and missile to seek and proceed toward energy radiated or reflected from an aircraft and toward an image locating an aircraft, and otherwise direct and guide the rocket and missile to an aircraft, in violation of Title 18, United States Code, Section 2332g(a)(1)(A); (ii) a device designed and intended to launch and guide said rocket and missile, in violation of Title 18, United States Code, Section 2332g(a)(1)(B); and (iii) a part and combination of parts designed or redesigned for use in assembling or fabricating said rocket, missile, and device, in violation of Title 18, United States Code, Section 2332g(a)(1)(C).

(Title 18, United States Code, Sections 2332g(a)(1)(A), (a)(1)(B), (a)(1)(C), (b)(1), (b)(2), (b)(5), (c)(1), and 3238.)

COUNT FOUR
(Narcotics Importation Conspiracy)

The Grand Jury further charges:

9. From at least in or about June 2019 to in or about April 2022, in the Southern District of New York, Thailand, Indonesia, Japan, Burma, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, TAKESHI EBISAWA, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE, the defendants, who were first arrested in the Southern District of New York, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

10. It was a part and an object of the conspiracy that TAKESHI EBISAWA, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE, the defendants, and others known and unknown, would and did import into the United States and into the customs territory of the United States from a place outside thereof controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

11. It was further a part and an object of the conspiracy that TAKESHI EBISAWA, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE, the defendants, and others known and unknown, would and did manufacture, distribute, and possess with intent to distribute controlled substances, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

12. The controlled substances that TAKESHI EBISAWA, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE, the defendants, conspired to (a) import into the United States and into the customs territory of the United States from a place outside thereof, and (b) manufacture, distribute, and possess with intent to

distribute, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, were (i) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 960(b)(1)(H), and (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 960(b)(1)(A).

(Title 21, United States Code, Section 963; and
Title 18, United States Code, Section 3238.)

COUNT FIVE

(Conspiracy to Possess Firearms, Including Machineguns and Destructive Devices)

The Grand Jury further charges:

13. From at least in or about June 2019 to in or about April 2022, in the Southern District of New York, Thailand, Indonesia, Japan, Burma, Denmark, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, TAKESHI EBISAWA, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE, the defendants, who were first arrested in the Southern District of New York, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate

Title 18, United States Code, Section 924(c).

14. It was a part and an object of the conspiracy that TAKESHI EBISAWA, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE, the defendants, and others known and unknown, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics importation conspiracy charged in Count Four of this Indictment, would and did knowingly use and carry firearms, and, in furtherance of such drug trafficking crime, knowingly possess firearms, including machineguns that were capable of automatically shooting more than one shot, without manual reloading, by a single function of the trigger, as well as destructive devices, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 924(c)(1)(B)(ii).

(Title 18, United States Code, Sections 924(o) and 3238.)

COUNT SIX
(Money Laundering)

The Grand Jury further charges:

15. From at least in or about October 2021 to in or about November 2021, in the Southern District of New York, Japan, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, TAKESHI EBISAWA, the defendant, who was first arrested in the Southern District of New York, (a) transported, transmitted,

and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds from a place inside the United States to and through a place outside the United States, and aided and abetted the same, with the intent to promote the carrying on of specified unlawful activity, to wit, the proceeds of the sale, distribution, and importation of a controlled substance, in violation of Title 21, United States Code; and (b) with the intent to (i) promote the carrying on of that specified unlawful activity and (ii) conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of that specified unlawful activity, conducted and attempted to conduct, financial transactions involving property represented to be the proceeds of that specified unlawful activity, and property used to conduct and facilitate that specified unlawful activity, and aided and abetted the same, to wit, EBISAWA and his associates transferred approximately \$100,000 in purported narcotics proceeds from accounts in New York City to Japan in order to make payment for the transportation of narcotics.

(Title 18, United States Code, Sections 1956(a)(2), 1956(a)(3), 1956(f), 2, and 3238.)

FORFEITURE ALLEGATIONS

16. As a result of committing the offenses alleged in Counts One and Four of this Indictment, TAKESHI EBISAWA, SOMPHOP SINGHASIRI, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE,

the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

17. As a result of committing the offense alleged in Count Three of this Indictment, TAKESHI EBISAWA, BOBBY SOOKSANTA CHULLANANDANA, a/k/a "Sooksanta Chullanandana," a/k/a "Suksan Jullanan," and SOMPAK RUKRASARANEE, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G), and Title 28, United States Code, Section 2461(c), any and all property, foreign and domestic, of the defendants; any and all assets, foreign and domestic, affording the defendants a source of influence over any entity or organization engaged in planning or perpetrating said offense; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting, or concealing said offense; and any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offense, including but not limited to a sum of

money in United States currency representing the total amount of the defendants' assets.

18. As a result of committing the offense alleged in Count Six of this Indictment, TAKESHI EBISAWA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Assets Provision

19. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code,

Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982;
Title 21, United States Code, Sections 853 and 970;
Title 28, United States Code, Section 2461.)

[REDACTED]
FOREPERSON

Damian Williams
DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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TAKESHI EBISAWA,
SOMPHOP SINGHASIRI,
BOBBY SOOKSANTA CHULLANANDANA,
a/k/a "Sooksanta Chullanandana,"
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SOMPAK RUKRASARANEE,

Defendants.

INDICTMENT

22 Cr.

(21 U.S.C. § 963; and 18 U.S.C. §§
924(o), 1956, 2332g, 3238, and 2.)

DAMIAN WILLIAMS

United States Attorney

[REDACTED]

Foreperson